
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	
)	
Boulos F. Estafanous,)	NO. 17-09908
)	
Debtor)	
)	Chapter 11
)	
)	Honorable Judge Jacqueline P. Cox

NOTICE OF MOTION

TO: See Attached Service List

PLEASE TAKE NOTICE that on January 9, 2018 at 9:30 a.m., the undersigned will appear before the Honorable Judge Jacqueline P. Cox at the Everett McKinley Dirksen United States Courthouse, located at 219 South Dearborn Street, Room 680, Chicago, Illinois and will then and there present the attached **MOTION FOR ENTRY OF FINAL DECREE**, at which time you may appear if you so choose.

BY: **S/PAUL M. BACH**
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MOTION FOR ENTRY OF FINAL DECREE

NOW COMES the Reorganized Debtor, Boulos F. Estafanous, by his attorneys, Penelope N. Bach and Paul M. Bach of Bach Law Offices, and ask this Honorable Court to enter a Final Decree, as well as closing this case with a reservation of jurisdiction to reopen this case for any of the reasons stated in the confirmed Chapter 11 Plan and/or Disclosure Statement. In support thereof, the Reorganized Debtor states as follows:

1. On March 29, 2017, the Debtor filed a Voluntary Petition for Relief, according to the provisions of Chapter 11 of the Code.
2. On September 6, 2017 and September 13, 2017, this Court held a hearing and entered an Order pursuant to Section 1129 of the bankruptcy Code confirming the Debtor's Plan of Reorganization.
3. The plan has been substantially consummated within the meaning of Section 1101(2) of the Bankruptcy Code.
4. Debtors request that this Court enter a final decree closing this Chapter 11 case. The final decree should expressly reserve jurisdiction in this Court for all pending matters, all final fee hearings, and those matters enumerated in Article VI of the Plan.

WHEREFORE, the Reorganized Debtor, Boulos F. Estafanous, asks this Honorable Court to enter a Final Decree closing this Chapter 11 case with an express reservation of jurisdiction as requested in this Motion, and for such other relief as is just and equitable.

Respectively Submitted,

Boulos F. Estafanous

By: /s/ Paul M. Bach

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